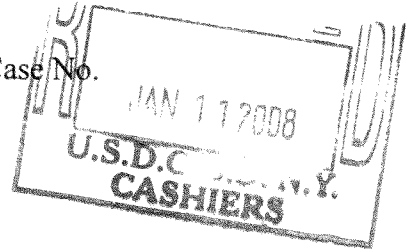


Judith Hellerstein
UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



-----X Case No.
PATRICIA DANTZLER,

Plaintiff,

-against-

PALISADES COLLECTION, LLC.

COMPLAINT
08 CV 0254

Defendant.
-----X

Plaintiff, by and through her attorneys, FAGENSON & PUGLISI, brings this complaint against the above-named defendant and in support thereof alleges the following:

INTRODUCTION

1. This is an action for damages brought by an individual consumer for defendant's violations of the Fair Debt Collection Practices Act ("FDCPA"), 15 U.S.C. § 1692, *et seq* which prohibits debt collectors from engaging in abusive, deceptive and unfair acts and practices.

PARTIES

2. Plaintiff is a natural person residing in this District and is a consumer as defined by the FDCPA, § 1692a(3).

3. Upon information and belief, defendant is a debt collector, as defined pursuant to 15 U.S.C. § 1692a (6), with its principal place of business in Delaware and with its Registered Agent CT Corporation System, 111 Eighth Avenue, New York, New York 10011.

JURISDICTION AND VENUE

4. This Court has jurisdiction and venue pursuant to 15 U.S.C. § 1692k(d) (FDCPA) and 28 U.S.C. § 1331.

AS AND FOR A FIRST CAUSE OF ACTION

5. Plaintiff re-alleges paragraphs 1 to 4 as if fully re-stated herein.

6. That on or about October 5, 2006 defendant sent a collection letter to the plaintiff in an attempt to collect an alleged debt incurred for personal purposes to AT&T Wireless. Plaintiff received said letter. A copy of said letter is attached as Exhibit "1".

7. That, following the plaintiff's receipt of the aforesaid letter, plaintiff's attorney, Concetta Puglisi, Esq., sent a letter to defendant on or about November 8, 2006. In the letter Ms. Puglisi advised defendant that she represented plaintiff and that plaintiff was disputing the debt defendant was attempting to collect. Ms. Puglisi's letter also stated that the debt defendant was attempting to collect was discharged in bankruptcy. Ms. Puglisi further advised defendant in the letter that defendant should not contact plaintiff directly regarding this debt. A copy of this letter is attached as Exhibit "2".

8. That, notwithstanding this communication from plaintiff's attorney, on or about May 18, 2007, defendant sent yet another collection letter directly to plaintiff. A copy of this letter is attached as Exhibit "3" above.

9. That said letter to plaintiff constitutes improper direct contact with plaintiff with full knowledge that she is represented by counsel in the matter and is in violation of the FDCPA, including but not limited to § § 1692c(a)(2) and 1692c(c). Said letters also violate § 1692e(10), as a false representation or deceptive means to collect or attempt to collect a debt or to

obtain information concerning a consumer.

AS AND FOR A SECOND CAUSE OF ACTION

10. Plaintiff re-alleges paragraphs 1-9 as if fully re-stated herein.

11. That by reason of the defendant's aforesaid violations of the FDCPA the plaintiff was confused and suffered stress, anxiety and emotional distress.

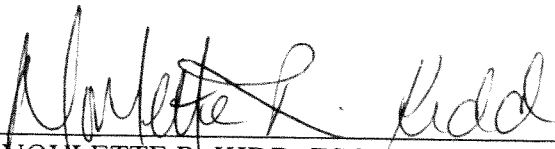
WHEREFORE, plaintiff respectfully prays that judgment be entered against the defendant as follows:

- (a) statutory damages pursuant to 15 U.S.C. § 1692k in an amount to be determined at the time of trial;
- (b) reasonable attorney's fees, costs and disbursements pursuant to 15 U.S.C. § 692k; and
- (c) for such other and further relief as may be just and proper.

DEMAND FOR TRIAL BY JURY

Plaintiff requests trial by jury on all issues so triable.

Dated: New York, New York
January 8, 2008.



NOVLETTE R. KIDD, ESQ. (NK2552)
FAGENSON & PUGLISI
Attorneys for Plaintiff
450 Seventh Avenue, Suite 3302
New York, New York 10123
Telephone: (212)268-2128

EXHIBIT "1"



PO BOX 1244
ENGLEWOOD CLIFFS NJ 07632

CHANGE SERVICE REQUESTED

PALISADES COLLECTION, L.L.C.

Office hours : M-F 8am-8pm
800-414-8319 201-308-9370 (Fax)

New York City Department of Consumer Affairs License Number 1223521 for the NJ

New York City Department of Consumer Affairs License Number 1223513 for the PA

#BWNKBHZ S-SFASTA10 L-105 A-5802354
#58023540# P06QYR00418354 I36708
DANTZLER,PATRICIA DANTZLER,PATRICIA
1874 BATHGATE AVE APT 4
BRONX NY 10457-6226



PALISADES COLLECTION, LLC
PO BOX 1244
ENGLEWOOD CLIFFS NJ 07632



October 5, 2006

Previous Creditor:
AT&T WIRELESS

Account Number :
0051173617

Debtor Id :
5802354

✕ Detach Upper Portion And Return With Payment ✕

Debtor Id: 5802354
Previous Creditor: AT&T WIRELESS
Current Creditor: Palisades Collection LLC
Account Number: 0051173617
Current Balance: \$1,336.11

CELLULAR PHONE NUMBER: 9175623135 3G

See Reverse Side for our Privacy Notice

Dear DANTZLER,PATRICIA DANTZLER,PATRICIA,

Please be advised that your account has been sold to Palisades Collection, L.L.C..

You are directed to address all future correspondence and payments concerning this account to this address:

Palisades Collection, L.L.C.
PO Box 1244
Englewood Cliffs, NJ 07632

When permitted by law, we may report information about your account to credit bureaus. Consequently, late payments, missed payments, or other defaults on your account may be reflected in your credit report.

If you have any questions regarding this letter, please contact us at the toll free telephone number provided.

Very Truly Yours,
Collection Department
800-414-8319

This is an attempt to collect a debt, and any information obtained will be used for that purpose. Unless you notify this office within 30 days after receiving this notice that you dispute the validity of the debt or any portion thereof, this office will assume this debt is valid. If you notify this office in writing within 30 days from receiving this notice, this office will obtain verification of the debt or obtain a copy of a judgment and mail you a copy of such verification or judgment. If you notify this office in writing within 30 days after receiving this notice, this office will provide you with the name and address of the original creditor, if different from the current creditor. All dispute correspondence should be mailed to: 87 S Commerce Way suite 700, Bethlehem PA 18017.

If you have recently filed a bankruptcy proceeding, please be aware that this letter is for informational purposes only. Please forward a copy of this letter to your counsel and/or the trustee, as appropriate, and refer them to a Palisades Collection, L.L.C. customer service representative at 800-414-8319.

EXHIBIT "2"

FAGENSON & PUGLISI
ATTORNEYS AT LAW

450 SEVENTH AVENUE
SUITE 3302
NEW YORK, NEW YORK 10123

LAWRENCE M. FAGENSON
CONCETTA PUGLISI
NOVLETTE R. KIDD

TELEPHONE: (212) 268-2128
FAX: (212) 268-2127

November 8, 2006

Palisades Collection, LLC.
PO Box 1244
Englewood Cliffs, NJ 07632

Re: Patricia Danztler
Previous Creditor: AT&T Wireless
Account #: 0051173617
Debtor ID #: 5802354

Dear Sir/Madam:

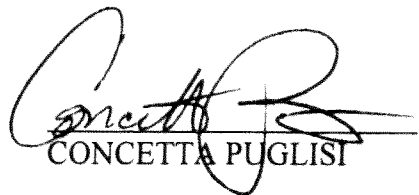
Please be advised that Fagenson & Puglisi represents Patricia Danztler. Ms. Danztler disputes the debt you are attempting to collect. This debt was discharged in bankruptcy.

Please provide this office with documentation supporting your claim. Do not contact our client directly. Delete or correct any negative entry which you may be reporting to the credit reporting agencies in accordance with the Fair Credit Reporting Act.

Please note that Fagenson & Puglisi is not authorized to accept Services of Progress on behalf of any client.

Should you have any questions please contact the undersigned.

Very truly yours,
FAGENSON & PUGLISI



CONCETTA PUGLISI

CP/mp
cc: Patricia Danztler

EXHIBIT "3"



PO BOX 1244

ENGLEWOOD CLIFFS NJ 07632

CHANGE SERVICE REQUESTED

Office Hours : M-F 8am-8pm
800-414-8319 201-308-9370 (Fax)

New York City Department of Consumer Affairs License Number 1223521 for the NJ of

New York City Department of Consumer Affairs License Number 1223513 for the PA of

#BWNKBHZ S-CDASTA10 L-P03 A-5802354

#58023540# P0AHUH00204453 I04455

DANTZLER,PATRICIA

1874 BATHGATE AVE APT 4

BRONX NY 10457-6226

PALISADES COLLECTION, LLC
PO BOX 1244
ENGLEWOOD CLIFFS NJ 07632

May 18, 2007

Previous Creditor :
AT&T WIRELESSAccount Number :
0051173617Debtor Id :
5802354

✕ Detach Upper Portion And Return With Payment ✕

Debtor Id: 5802354
Previous Creditor: AT&T WIRELESS
Current Creditor: Palisades Collection LLC
Account Number: 0051173617
Total amount due as of May 18, 2007: \$1,336.11

Dear DANTZLER,PATRICIA,

Please contact our office upon receipt of this letter to discuss your account.

Thank you for your anticipated cooperation.

Very truly yours,

COLLECTION DEPARTMENT
800-414-8319

This communication is from a debt collector and is an attempt to collect a debt. Any information obtained will be used for that purpose.

If you have recently filed a bankruptcy proceeding, please be aware that this letter is for informational purposes only. Please forward a copy of this letter to your counsel and/or the trustee, as appropriate, and refer them to a Palisades Collection, L.L.C. customer service representative at 800-414-8319.